

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN

In re
Timothy Richard Callahan, Jr. and Christy Ann Dahlen
fka Christy A Bowman,

Chapter 13

Case No. 20-13160-cjf

Debtors.

**STIPULATION RESOLVING MOTION FOR RELIEF FROM
AUTOMATIC STAY**

As a resolution of the Motion for Relief from Automatic Stay filed by LSF9 Master Participation Trust, its successors, servicing agents, and/or assigns (hereinafter "Movant") in the above referenced case regarding the property rented by Timothy Richard Callahan, Jr. and Christy Ann Dahlen fka Christy A Bowman, (hereinafter "Debtors") located at 4941 State Road 73, Marshall, WI 53559, and Movant, by their respective attorneys, hereby agree and Stipulate as follows:

1. That Movant may file a claim pursuant to 11 U.S.C. § 1305 for the arrearage amount totaling \$11,948.00.
2. That the arrearage claim was computed as follows:

6 Payments at \$1,785.00	03/01/2022 – 08/01/2022	\$10,710.00
Attorney Fees		\$1,050.00
Filing Cost		\$188.00
Grand Total		\$11,948.00

3. That Debtors shall amend the plan within 30 days from an order on this stipulation to address Movant's claim. Should Debtors fail to amend the plan as required, or should the amended plan fail to pay Movant's claim, Movant may file an affidavit and proposed

order and request that the relief requested in its motion for relief from the automatic stay be granted.

4. That beginning September 1, 2022, the Debtors shall pay regular monthly rental payments directly to Movant. Currently the amount of said monthly payment is \$1,785.00. Each monthly rental payment is due before the 1st day of the month and must be received by Movant no later than the 5th day of each month to be considered timely.
5. Currently, payments may be sent to LSF9 Master Participation Trust at 1380 E Jefferson Avenue, Detroit, Michigan 48207.
6. That Movant is provided a 6-month doomsday provision on the regular monthly rental payments beginning with the September 1, 2022 payment and continuing through and including the February 1, 2023 payment. Should the Debtors fail to timely remit any of said payments or should any of said payments be returned for insufficient funds, Movant may file an affidavit and proposed order and request that the relief requested in its motion for relief from the automatic stay be granted.
7. Thereafter, Movant shall have the right to renew its Motion via letter to the Court for the remainder of the Plan.

Dated: September 8, 2022

Mark A. Gauthier

Mark A. Gauthier
Miller & Miller Law
Attorney for Debtors

Dated: September 8, 2022

/s/ Kelly M. Smith

Kelly M. Smith
PHILLIP A. NORMAN, P.C.
Attorney for Movant

Drafted By:
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